

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In Re: Carletta Carter)	
)	
Debtor.)	Case No. 08-35651-KRH
)	Chapter 13
)	
_____)	
)	
CARLETTA CARTER,)	
)	
Plaintiff.)	
)	
v.)	Adv. Proceeding No. 09-03012-KRH
)	
MERS et al.)	

ANSWER

Comes now Dewey B. Morris ("Morris"), Trustee, by counsel, and for his answer to the Complaint to Determine the Validity, Priority or Extent of Lien of Wilshire Credit Corp. states as follows:

1. Morris admits the allegations contained in paragraphs 1-3.
2. Morris denies the allegations in paragraphs 4-5 as drafted.
3. Upon information and belief, paragraph 6 is admitted.
4. In response to paragraph 7, Morris admits that he has been named as a trustee on Deeds of Trust in favor of Encore Credit Corp. Upon information and belief, Morris admits that he has been named as Trustee on a Deed of Trust securing an indebtedness owed by the

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Counsel for Dewey B. Morris

Debtor/Plaintiff to Encore Credit Corp. To the extent that paragraph 7 alleges any other facts, they are denied.

5. Morris has insufficient information to admit the allegations contained in paragraphs 8-19 and therefore denies them.
6. Morris denies that he has wronged the Debtor/Plaintiff in any way.

WHEREFORE, Dewey B. Morris, Trustee, by counsel, respectfully requests that this Court not take any action adverse to him and that the Court grant him such relief that the Court deems appropriate.

Respectfully Submitted,

DEWEY B. MORRIS

/s/ Robert R. Musick
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 17, 2009, a copy of the foregoing Answer was served electronically through the Court's ECF system on:

Harrison Darden Hutson
4807 Hermitage Road
#205
Richmond, VA 23227
(804)266 4680
1 866 455 1349 (fax)
hdhlaw@gmail.com

I further certify that a copy of the foregoing Motion for Relief from Stay and Notice of Motion and Hearing was mailed, postage prepaid, to the following defendants:

CT Corporation System
4701 Cox Road
Suite 301
Glen Allen, VA 23060
Registered Agent for MERS

National Registered Agents, Inc.
526 King Street, Suite 423
Alexandria, VA 22314
Registered Agent for Encore Credit Corp.

Corporation Service Company
11 South 12th Street
Richmond, VA 23218
Registered Agent for Wilshire Credit Corp.

_____/s/ Robert R. Musick
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